

From: Jackson, Scott
Sent: Tuesday, March 25, 2014 8:41 AM
To: Diaz, Angelique; Razzazian, Christopher; Schiller, Ron; Olson, Kyle
Subject: ND & SD mid-year mtg's

Hi,

The North Dakota and South Dakota mid-year meetings are next week. Below are the talking points from last year's meetings. Please take a look and provide updates for the topics related to your work area (Chris: NEPA, Kyle: DERA, Ron: Indoor Air, Angelique: Radiation).

Please send this to me by COB this Friday. Thanks! Scott

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North Dakota talking points

➤ NEPA: We are providing technical review on the air quality aspects of oil and gas related projects in ND. Projects areas include the Dakota Prairies Grasslands and Ft. Berthold Indian Reservation (both Bakken shale). The MT-Dakotas state BLM office is also coordinating several Resource Management Plans (RMP) for oil and gas on federal lands throughout eastern MT and western ND. BLM is also coordinating the Air Quality Technical Workgroup which the air directors of MT, ND and SD have had some involvement in.

➤ Indoor Air/Radon: ND is receiving partial funding of its 2012 allocation of SIRG grants for radon. Thus far, ND has received just under 50% (~\$30,000) of funding through the PPG but whether they receive the rest of the allocation is unknown due to sequestration.

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➤ Radiation and Oil and Gas: There has recently been an interest in the radiation levels of various waste streams in the oil and gas industry. This radiation is referred to as TENORM (technologically enhanced naturally occurring radioactive material). EPA does not have any regulations regarding TENORM. Internal discussions are being had regarding this topic. Note that there may be transportation (e.g. DOT regs.) and disposal regulations concerning radionuclides that are applicable to oil and gas waste streams. [Only mention if asked about this topic.]

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South Dakota talking points

➤ Uranium Industry/NESHAPs: The Dewey Burdock ISR operations requires a Rad NESHAPs application for their ponds. However, the company (Powertech) does not consider the Radionuclide NESHAP Subpart W an applicable regulation. If an